

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MORGAN FUNDING CORPORATION,

Plaintiff,

v.

MARIO H. FIGUEROA, et al.,

Defendants

Case No.: 07 Civ. 4073 (RMB)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3 (c) of the local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Shaffin A. Datoo, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

James E. Fagan, III
Venable LLP
575 7th Street, NW
Washington, DC 20004
Tel.: (202) 344-8041
Fax: (202) 344-8300

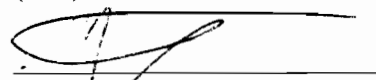
James E. Fagan, III is a member in good standing of the Bars of the Commonwealth of Virginia and the District of Columbia. There are no pending disciplinary proceedings against James E. Fagan, III in any State or Federal Court.

Dated: August 6, 2007
New York, New York

Respectfully submitted,

VENABLE LLP
405 Lexington Avenue, 62nd Floor
New York, NY 10174
(212) 307-5500

By:


Shaffin A. Datoo (SD-6929)

ATTORNEYS FOR PLAINTIFF

2007 AUG - 9 AM 9:00
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

6/16/08 8/9/07
25-26
6023249

CERTIFICATE OF SERVICE

I, Shaffin A. Dato, hereby certify that on August 6, 2007, I caused a true and correct copy of the **Motion to Admit Counsel *Pro Hac Vice*** to be served via first class mail on Defendants as follows:

MARIO H. FIGUEROA

393 W. 49th Street
New York, NY 10019
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

ACZEL RICO

217 Hazen Ave, Apt 1E
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JOHN BLOTT

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Brooklyn, NY 11226
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Elmhurst, NY 11373
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JOHN LEONE

552 W. 163rd Street, Apt. 31
New York, NY 10032

CHRISTOPHER NAYLOR

10 Laurel Court
Highland Mills, NY 10930

CHRISTOPHER VAN DYKE

561 10th Ave.
New York, NY 10036
and
c/o Robbins and Lloyd Mortgage
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CARLOS VILLAR

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Bronx, NY 10453
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JAMES YIN

153 S. 74th Street
Brooklyn, NY 11228
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

BENJAMIN YIP

58-18 206th Street
Bayside, NY 11364

JONATHAN E. VERAS

420 W. 42nd Street, #24H
New York, NY 10036



SHAFFIN A. DATOO

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
MORGAN FUNDING CORPORATION,	:	
	:	Case No.: 07 Civ. 4073 (RMB)
Plaintiff,	:	
	:	AFFIRMATION OF SHAFFIN A.
	:	DATOO IN SUPPORT OF MOTION TO
v.	:	ADMIT COUNSEL <i>PRO HAC VICE</i>
	:	
	:	
MARIO H. FIGUEROA, et al.,	:	
	:	
Defendants.	:	
-----X		

Shaffin A. Datto, an attorney duly admitted to practice law in the State of New York and in the Southern District of New York, hereby affirms under penalties of perjury as follows:

1. I am an associate attorney at Venable LLP, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit James E. Fagan, III as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.
3. I have known James E. Fagan, III since January 2007.
4. James E. Fagan, III is an associated attorney at Venable LLP, in Washington, D.C. His office is located at 575 7th Street, N.W., Washington, DC 20004.
5. Certificates of good standing for James E. Fagan, III are attached hereto as **Exhibit A**.

6. I have found James E. Fagan, III to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of James E. Fagan, III, *pro hac vice*.
8. I respectfully submit a proposed order granting the admission of James E. Fagan, *pro hac vice*, which is attached hereto as **Exhibit B**.

WHEREFORE, it is respectfully requested that the motion to admit James E. Fagan, III *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

Dated: August 6, 2007
New York, New York



SHAFFIN A. DATOO (SD-6929)

Howard W. Martin, Jr., President
Crenshaw, Ware & Martin, P.L.C.
1200 Bank of America Center
Norfolk, VA 23510-2111
Telephone: (757) 623-3000

Manuel A. Capsalis, President-elect
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George W. Chabalewski
Bar Counsel



Virginia State Bar

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Richmond, Virginia 23219-2800
Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

Thomas A. Edmonds
Executive Director and
Chief Operating Officer

Mary Yancey Spencer
Deputy Executive Director

Elizabeth L. Keller
Assistant Executive Director
for Bar Services

Susan C. Busch
Assistant Executive Director
for Administration

July 19, 2007

CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT JAMES EDWARD FAGAN, III IS AN
ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING.*

*MR. FAGAN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON
OCTOBER 1, 1992, AFTER SUCCESSFULLY PASSING THE BAR
EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

SINCERELY,

A handwritten signature in black ink, appearing to read "Thomas A. Edmonds".

**THOMAS A. EDMONDS
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER**



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

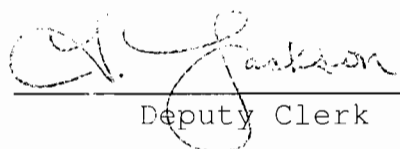
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES EDWARD FAGAN

was on the 11TH day of DECEMBER, 2006
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on July
12, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MORGAN FUNDING CORPORATION, :

Plaintiff. :

v. :

MARIO H. FIGUEROA, et al.. :

Defendants. :

Case No.: 07 Civ. 4073 (RMB)

**ORDER FOR ADMISSION OF
COUNSEL *PRO HAC VICE***

-----X
Upon the Motion of Shaffin A. Dato, attorney for Plaintiff, Morgan Funding Corp., and said sponsor attorney's affirmation in support;

IT IS HEREBY ORDERED that:

James E. Fagan, III
Venable LLP
575 7th Street, NW
Washington, DC 20004
Tel.: (202) 344-8041
Fax: (202) 344-8300
E-mail: jefagan@venable.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Morgan Funding Corp., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____, 2007
New York, New York

U.S.D.J./U.S.M.J

CERTIFICATE OF SERVICE

I, Shaffin A. Dato, hereby certify that on August 6, 2007, I caused a true and correct copy of the **Affirmation of Shaffin A. Dato In Support of Motion to Admit Counsel Pro Hac Vice** to be served via first class mail on Defendants as follows:

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